

**FILED UNDER SEAL**

Exhibit R

IN THE UNITED STATES DISTRICT COURT  
 FOR THE EASTERN DISTRICT OF TEXAS  
 SHERMAN DIVISION

DAMONIE EARL, LINDA RUGG, §  
 ALESA BECK, TIMOTHY BLAKEY, §  
 JR., STEPHANIE BLAKEY, §  
 MARISA THOMPSON, MUHAMMAD §  
 MUDDASIR KHAN, ELIZABETH §  
 COOPER, JOHN ROGERS, §  
 VALERIE MORTZ-ROGERS and §  
 LAKESHA GOGGINS, each §  
 individually and on behalf §  
 of all others similarly §  
 situated, §

CA NO.: 4:19-cv-00507

Plaintiffs, §

VS. §

THE BOEING COMPANY, and §  
 SOUTHWEST AIRLINES CO., §

Defendants. §

ORAL AND VIDEOTAPED DEPOSITION OF

WILLIAM B. LUSK

VIA ZOOM VIDEOCONFERENCE

Dallas, Texas

Friday, August 21, 2020

Reported by:

JANICE K. McMORAN, CSR, RDR, CRR, TCRR

JOB NO. 183138

1 MR. LORIN: Andrew Lorin for Lakesha  
2 Goggins and also Alesa Beck, Domonie Earl,  
3 Valerie Rogers, John Rogers, Stephanie  
4 Blakey, and Tim Blakey.

5 MR. BATHAEE: If I may, I'd like to  
6 lodge a continuing objection to  
7 Mr. Lorin's unauthorized appearance at  
8 this deposition on any client I represent.

9 MR. DUNNE: Brian Dunne on behalf of  
10 plaintiff, from Los Angeles, California.

11 MR. HATCH: Ben Hatch of McGuireWoods  
12 on behalf of Boeing.

13 MR. FAGELMAN: Yavar, before we get  
14 started, can we have an agreement that an  
15 objection by one defendant is good for all  
16 defendants?

17 MR. BATHAEE: Sure, if you guys are  
18 okay with it.

19 MR. FAGELMAN: Thank you.

20 WILLIAM B. LUSK,  
21 having been duly remotely sworn, testified  
22 as follows:

23 EXAMINATION

24 Q. Can you please state your name and  
25 address for the record?

1 A. No.

2 Q. Do you think his separation was  
3 deserved?

4 MR. FAGELMAN: Objection, form.

5 A. I don't know enough about his  
6 situation to make a statement on that.

7 BY MR. BATHAEE:

8 Q. What do you know about his situation?

9 A. I know he's leaving.

10 Q. That's it?

11 A. I know -- I know in -- I know that  
12 he's -- he has some legal things that he's  
13 that's really all I know.

14 Q. Are you aware as to whether he's  
15 under criminal investigation?

16 MR. FAGELMAN: Objection, form.

17 A. No. Honestly, I am not.

18 MR. BATHAEE: All right. Well, I  
19 have no further questions. I continue to  
20 object to Mr. Lorin's loitering at  
21 depositions, and with that I'm done.

22 MR. FAGELMAN: Are you passing the  
23 witness?

24 MR. BATHAEE: Sure.

25 MR. FAGELMAN: All right. We will